

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

=====X Index No. 07CIV6372  
ADONNA FROMETA,

Plaintiff,

**NOTICE OF MOTION**

-against-

MARIO E. DIAZ-DIAZ, ALL AMERICAN HAUELRS  
RECYCLING,

Defendants.

=====X

**PLEASE TAKE NOTICE**, that upon the annexed affirmation of SLAWEK W. PLATTA, ESQ., dated April 4, 2008, and upon all papers filed and all the proceedings previously had herein, the plaintiff ADONNA FROMETA will move this Court, in front of Honorable Harold Baer Jr., at the Courthouse located at 500 Pearl Street, New York, New York on the 21<sup>st</sup> day of April, 2008, at 9:30 a.m., or as soon thereafter as counsel can be heard, for an Order pursuant to FRCP Rule 56 granting summary judgment on the issue of liability in favor of the plaintiff and for such other relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to FRCP Rule 6.1(b), answering papers, if any, must be served within ten business days after service of the moving papers.

Dated: April 7, 2008  
New York, New York

Yours etc.,  
SLAWEK W. PLATTA, PLLC

  
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